

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:05cr122-MHT
)	
PATRICIA ANN CANTALINE)	

UNITED STATES' MOTION FOR DOWNWARD DEPARTURE
PURSUANT TO U.S.S.G. § 5K1.1

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and respectfully requests this Honorable Court to grant the United States' Motion for Downward Departure of one level. The United States submits that the one level downward departure is based upon the defendant's substantial assistance, and as grounds for this motion, the United States submits the following:

1. Pursuant to U.S.S.G. § 5K1.1, the United States files this motion for a downward departure to reduce Defendant Cantaline's sentence by one level as stated above.
2. The United States submits that Defendant Cantaline offered information to law enforcement which was important to the investigation of other offenses as well as resolving the charges against co-defendant Matthew Leo Kelley.

WHEREFORE, the United States respectfully requests that this Motion for Downward Departure be GRANTED.

Respectfully submitted this 1st day of March, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/Kent B. Brunson
KENT B. BRUNSON
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334)223-7280
Fax: (334)223-7135
E-mail: kent.brunson@usdoj.gov

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Kevin L. Butler, Esquire.

Respectfully submitted,

/s/Kent B. Brunson
KENT B. BRUNSON
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334)223-7280
Fax: (334)223-7135
E-mail: kent.brunson@usdoj.gov